

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. RDB-14-0186
	:	Civil No. RDB-19-2312
RICHARD C. BYRD,	:	
Defendant.	:	

CONSENT MOTION OF RICHARD C. BYRD TO EXTEND THE TIME TO RESPOND
TO THE GOVERNMENT’S OPPOSITION TO DEFENDANT’S CORRECTED
MOTION TO VACATE, SET ASIDE, OR CORRECT SENTENCE PURSUANT TO 28
U.S.C. § 2255

Richard C. Byrd respectfully requests through undersigned counsel that the Court extend the time for his reply in opposition to the Government’s Opposition to Defendant’s Corrected Motion to Vacate, Set Aside, or Correct Sentence Pursuant to 28 U.S.C. § 2255. The Government filed its opposition on March 2, 2020, making the response due on March 16, 2020.

Defendant wishes to consult with his attorneys about the response, and counsel have been unable to complete the research for the response, write the response and arrange meetings with Defendant for such consultation in time for a filing on March 16, 2020. As the Court well knows, the entire region has also been distracted by unprecedented school, work and other closures, which have caused some, including undersigned counsel, to spend time that may have otherwise been spent on this motion on those matters. Therefore, as required by this Court’s rules, undersigned counsel consulted Government counsel, and Government counsel graciously agreed to an extension until April 6, 2020.

Defendant therefore respectfully requests that this Court grant his Motion for an Extension of Time such that his response will be due on April 6, 2020.

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Lee Ann Anderson

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Extension of Time was served
this 13th day of March, 2020, via CM/ECF on all parties.

/s/ Lee Ann Anderson

Lee Ann Anderson
Attorney for Richard C. Byrd